

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
DeKalb County Public Library) CC Docket No. 02-6
In the Schools and Libraries Program)

REQUEST FOR WAIVER OF FCC RULES

DeKalb County Public Library, BEN: 127270

FCCRN: 0011794880

Forms 500: : 88803, 87943

The DeKalb County Public Library respectfully requests to appeal the originally denied appeal 88803 of the FY 2017 Funding Request (FRN 1799113249) on Form 471 application number 171038730.

The original Form 470 (160038176) was posted on March 21, 2016 for Internal Connections. The Library wrote and associated an RFP with this form that included requests for equipment and managed services for the equipment. At that time, the preparer of the Form 470 did not understand that she was required to or had the ability to check a second box in addition to Internal Connections to indicate the RFP was also for Basic Maintenance of Internal Connections.

By April 18, 2016, the Library had received three competing bids, all of which included managed services (MIBS). Even though we did not initially check the box for MIBS on our Form 470, the services were nonetheless competitively bid.

On July 31, 2016, the Library certified the 471 application (161061069) requesting funding for switches and managed services, which was approved. We filed the form 486 on February 7, 2017 and received these services.

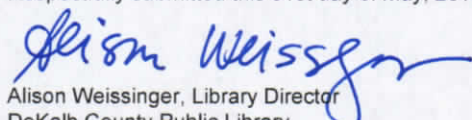
For the next funding year (FY 2017), we filed a Form 471 to continue the services based on the same 470 (160038176). The Form 471 application (171038730) was certified by the Library on May 9, 2017. We continued managed services with the vendor. Beginning in September of 2017, the 471 was in PIA review, and the Library and USAC communicated until October 23, 2017, when the FRN was denied by the Review Team for the reason: "FCC Form 470 does not support the request."

By that date, the Library was already using the services well into the funding year and was paying out-of-pocket for services that had been approved the prior year. The Library submitted an appeal, Form 500 (88803). It was denied, but USAC created an additional appeal that was approved: Form 500 (87943) to allow for the funding already reimbursed to the Library during FY 2016.

Appeal 88803 was denied on April 25, 2017. The Library then cancelled services with the vendor due to non-funding.

The Library is asking through this appeal that the FCC approve the funding for Form 471 application (171038730) for managed services. We fully believed in good faith that we were in compliance with all E-rate rules since an RFP was issued and all services were competitively bid. Because this request was approved in FY 2016 with no indication of error, we moved forward with FRN 1799113249, not knowing until September of 2017 that there was a mistake on the original 470 -- one checkbox was not selected.

Respectfully submitted this 31st day of May, 2018.


Alison Weissinger, Library Director
DeKalb County Public Library
3560 Kensington Rd.
Decatur, GA 30032